

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**23 MAG 7201**

UNITED STATES OF AMERICA

v.

LUIS DEJESUS,  
a/k/a “Manny,”

Defendant.

**SEALED COMPLAINT**

Violations of 18 U.S.C. §§ 922(g), 924(a)  
and 2.

COUNTY OF OFFENSE:  
BRONX

SOUTHERN DISTRICT OF NEW YORK, ss.:

MICAH FRIEDMAN, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation (“FBI”), and charges as follows:

**COUNT ONE**  
**(Possession of Ammunition After a Felony Conviction)**

1. On or about October 15, 2023, in the Southern District of New York and elsewhere, LUIS DEJESUS, the defendant, knowing he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ammunition, to wit, seven 9mm shell casings, and the ammunition was in and affecting commerce.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

2. Based on my review of reports prepared by officers from the New York City Police Department (“NYPD”) as well as my review of surveillance video, I have learned, among other things and as more particularly described below, that on or about October 15, 2023, a shootout (the “Shootout”) between at least two individuals occurred in the vicinity of 1080 Anderson Avenue in the Bronx, New York, during which multiple rounds were discharged and at least one person was injured.

3. Based on my review of surveillance video and audio captured from residences and store fronts on Anderson Avenue, I have learned, among other things, the following:

- a. As depicted below, on or about October 15, 2023, at approximately 10:26 p.m., a man, later identified as LUIS DEJESUS (“DEJESUS”), the defendant, wearing black pants, a dark hooded sweatshirt, and black and white shoes was standing in conversation with an unidentified woman across the street from 1080 Anderson Avenue. During the conversation, DEJESUS stated, “they’re fucking with my money.” Woman-1 responded, in sum and substance, that there was enough money for everyone, to which DEJESUS responded, “fuck that, I’m out here, I’m going to stay out here.”



- b. Moments later, DEJESUS began walking northbound on Anderson Avenue toward 1120 Anderson Avenue. At approximately 10:28 p.m., DEJESUS began crossing Anderson Avenue, heading east. Simultaneously, four men (the “Group”) exited the lobby of 1080 Anderson Avenue.

- c. As DEJESUS crossed Anderson Avenue, the Group began firing gunshots in the direction of DEJESUS. DEJESUS raised his arm as if he was retuning gunfire, and ran behind a car near 1110 Anderson Avenue, where he continued to return fire.
  - d. After the Shootout, at approximately 10:29 p.m., DEJESUS ran northbound on Anderson Avenue with what appeared to be a slight limp — consistent with suffering an injury during the Shootout — before entering a building in the vicinity of 1122 Anderson Avenue.
4. Based on my involvement in the investigation and my review of reports including property vouchers prepared by officers from the NYPD, I have learned the following:
- a. On or about October 15, 2023, at approximately 10:28 p.m., officers from the NYPD received a shotspotter activation, notifying them of suspected gunshots in the vicinity of Anderson Avenue in the Bronx, New York.
  - b. NYPD Officers who responded to the shotspotter activation (the “Responding Officers”) recovered a total of 18 shell casings and live rounds from the scene along Anderson Avenue. In particular and among other things, the Responding Officers recovered one live 9mm round (the “Live Round”) and seven 9mm shell casings (the “Shell Casings”) from a spot behind a car in front of 1110 Anderson Avenue—consistent with the location from which DEJESUS can be seen returning fire in the surveillance video described above.
  - c. At approximately 10:34 p.m. — approximately six minutes after the shotspotter activation — the Responding Officers encountered a man matching the appearance of DEJESUS, with a gunshot wound to the leg, near 1122 Anderson Avenue.

d. DEJESUS told the Responding Officers, in sum and substance, that he had been walking down Anderson Avenue when he got shot in the leg. DEJESUS identified himself to responding Emergency Medical Services personnel as “Luis DeJesus.”

5. Based on my review of body worn camera footage and NYPD reports and as depicted below, I know that, at approximately 10:34 p.m. — approximately six minutes after the shotspotter activation — the Responding Officers encountered LUIS DEJESUS, the defendant, with a gunshot wound to the leg, near 1122 Anderson Avenue. At the time law enforcement officers encountered DEJESUS, he had applied a makeshift tourniquet to his leg and was dressed in a short-sleeved shirt, dark pants, and black and white shoes.



6. Based on my review of surveillance video, I have learned that on or about October 15, 2023, between approximately 10:29 p.m. and 10:34 p.m. — that is, the time between when LUIS DEJESUS, the defendant runs into the area of 1122 Anderson Avenue and when the

NYPD encounters DEJESUS near 1122 Anderson Avenue— no one other than DEJESUS is visible in the vicinity of 1122 Anderson Avenue.

7. Based on my conversations with a Special Agent from the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) who is familiar with the manufacturing of ammunition and who reviewed photographs of the Shell Casings, I know that the Shell Casings were manufactured outside the State of New York.

8. I have reviewed criminal history records pertaining to LUIS DEJESUS, the defendant, which show that DEJESUS was convicted on or about May 25, 2005, in Bronx County Supreme Court of attempted criminal possession of a loaded firearm in the third degree and was sentenced to an eighteen-month term of imprisonment.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of LUIS DEJESUS, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

S/ by the Court with permission

MICAH FRIEDMAN  
Special Agent, FBI

Sworn to by reliable electronic means, this  
14th November day of 2023.



THE HONORABLE ROBERT W. LEHRBURGER  
United States Magistrate Judge  
Southern District of New York